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*A.J. Copeland*

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**IN RE HEWLETT-PACKARD  
COMPANY SHAREHOLDER  
DERIVATIVE LITIGATION**

**This Document Relates To:**

**ALL ACTIONS.**

) Master File No. C-12-6003-CRB (EDL)

)

) **STIPULATION AND ~~[PROPOSED]~~ ORDER**

) **REGARDING DISCOVERY IN**

) **CONNECTION WITH THE THIRD**

) **AMENDED AND RESTATED**

) **STIPULATION OF SETTLEMENT AS**

) **MODIFIED**

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**STIPULATION**

**WHEREAS**, A.J. Copeland, a shareholder of Hewlett-Packard Company (“HP” or the “Company”), has moved the Court for an order permitting Mr. Copeland to take discovery, including serving the attached document requests and interrogatories, which he asserts is necessary for a meaningful record for the final approval hearing on July 24, 2015;

**WHEREAS**, on March 25, 2015, the Court denied such motion without prejudice;

**WHEREAS**, counsel for the HP and Plaintiff subsequently conferred with counsel for Mr. Copeland; and

**WHEREAS**, the participants have agreed to resolve the issue raised by the motion as to whether Mr. Copeland may serve the attached discovery requests upon HP and Plaintiff, subject to Order of the Court, as follows:

1. The Document Requests attached hereto as Exhibit A and Interrogatories as Exhibit B (collectively “Discovery”) shall be deemed served on HP and Plaintiff.
2. HP and Plaintiff, through their respective counsel, shall serve their objections, if any, to such Discovery within 14 days following service.
3. HP and Plaintiff shall otherwise respond to the Discovery within 21 days following service.
4. Counsel for Mr. Copeland, HP and Plaintiff shall “meet and confer” within 7 days following service of any such objections and additional responses to Discovery to determine whether the objections can be withdrawn or limited and in an attempt to resolve any disputes regarding the responses to the Discovery, generally.

5. To the extent there are any remaining disagreements regarding the Discovery and/or the objections thereto, ~~Mr. Copeland shall promptly move the Court for relief, such motion to be made returnable 14 Days following service thereupon.~~ the parties shall file a joint letter no later than five business days after the meet and confer session, unless otherwise directed by the court. Lead trial counsel for each party must sign the letter, which shall include an attestation that the parties met and conferred in person or by telephone regarding all issues prior to filing the letter. Going issue-by-issue, the joint letter shall describe each unresolved issue, summarize each party's position with appropriate legal authority, and provide each party's final proposed compromise before moving to the next issue. The joint letter shall not exceed eight pages (12-point font or greater; margins no less than one inch) without leave of court. Parties are expected to plan for and cooperate in preparing the joint letter so that each side has adequate time to address the arguments. If a joint letter is not possible, each side may submit a letter not to exceed three pages, which shall include an explanation of why a joint letter was not possible. The parties shall submit one exhibit that sets forth each disputed discovery request in full, followed immediately by the objections and/or responses thereto. No other information shall be included in the exhibit. No other exhibits shall be submitted without prior court approval. The court will review the submission(s) and determine whether formal briefing or proceedings are necessary.

**IT IS SO STIPULATED.**

Dated: March 27, 2015

Attorneys for Shareholder A.J. Copeland

By: /s/ Richard D. Greenfield

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Dated: March 27, 2015

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Dated: March 27, 2015

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Morrical, derivatively on behalf of Hewlett-Packard  
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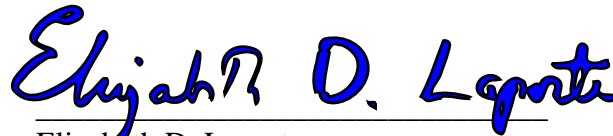
STIPULATION AND [PROPOSED] ORDER  
REGARDING DISCOVERY IN CONNECTION  
WITH THE THIRD AMENDED AND RESTATED  
STIPULATION OF SETTLEMENT  
Master File No. C-12-6003-CRB (EDL)

**~~PROPOSED~~ ORDER**

Pursuant to the foregoing stipulation, and good cause appearing,

**IT IS SO ORDERED AS MODIFIED.**

Date: March 27, 2015



Elizabeth D. Laporte

United States Magistrate Judge